



GEORGIA M. PESTANA
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

SUZANNE E. FUNES
Senior Counsel
phone: (212) 356-2386
fax: (212) 356-1148
email: sfunes@law.nyc.gov

October 10, 2019

VIA ECF

Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Jazmine Headley, on her own behalf and on behalf of her minor son D.B. v. City of New York, et al., 19-CV-4543 (ENV)(RLM)

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and the attorney for defendant City of New York ("City"). I write with the consent of plaintiff's counsel, Katie Rosenfeld, Esq. to respectfully request that the Court grant defendant City an extension of time from November 4, 2019 to 30 days after mediation is held and completed within which it may answer or otherwise respond to the complaint. This is the second request for an extension of time to respond to the complaint.

In addition to the reasons discussed in the City's first enlargement letter dated August 28, 2018 [Docket Entry No. 7], the City requests an enlargement of time to Answer as the parties will participate in a prompt Court-annexed mediation where the matter may be resolved. Because representation is still being resolved, at this time, we are not writing on behalf of Human Resources Authority ("HRA") Peace Officer Bettina Barnett-Weekes; HRA Sergeant Toyin Ramos-Williams; Peace Officer Mayra Rivera; Juanita Alston; and New York City Police Department Officer Shawndel Latham, but respectfully request for a *sua sponte* corresponding extension.

Thank you for your consideration herein.

Respectfully submitted,
Suzanne Funes
Suzanne E. Funes

cc: All Counsel (via ECF)